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Hon. Paul A. Crotty
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, New York 10007

Re: Upsolve, Inc., et al., v. James, 22-CV-627 (PAC)

Dear Judge Crotty:

We represent Plaintiffs Upsolve, Inc., and Rev. John Udo-Okon in connection with the above-referenced matter. We write to respectfully request: 1) a brief extension of time to submit a reply in support of Plaintiffs' Motion for a Preliminary Injunction (ECF 5, the "Motion"), and 2) that the Court schedule oral argument on the Motion.

First, Plaintiffs request a brief extension of time to Monday, May 2, 2022, to file a reply brief in support of the Motion. Defendant consents to Plaintiffs' requested extension. Granting Plaintiffs' request is fully consistent with the briefing schedule initially established by the Court. Following the scheduling conference of February 1, 2022, the Court ordered that Defendant's opposition to the motion would be due by Friday, March 11, 2022, and Plaintiff's reply would be due just over two weeks later on Monday, March 28, 2022. The Court subsequently extended the deadline for Defendant's opposition brief to Monday, April 18, 2022. At that time, however, the Court did not extend the deadline of Plaintiffs' reply. In light of the significance and complexity of the issues raised and for all of the reasons that originally justified the Court's ordering of a two-week reply window, Plaintiffs accordingly seek an extension to preserve the Court's previously ordered timing. This is Plaintiffs' first request for an extension in this matter.

Second, Plaintiffs also request that the Court schedule oral argument on the Motion under Rule 3.K of Your Honor's Individual Practices in Civil Cases. Argument is justified given the significance and complexity of the issues the Motion raises.

Respectfully submitted,

/s/ Gregory Silbert

Gregory Silbert

cc: Counsel of Record (via ECF)